

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Renée Marie Bumb,  
Chief District Court Judge

**TORRENT’S MOTION TO CLARIFY WHETHER DR. NAGAICH MAY  
TESTIFY AS TO CERTAIN TOPICS WITH RESPECT TO WHICH  
PLAINTIFFS’ EXPERT, MR. RUSS, HAS BEEN PERMITTED TO  
TESTIFY**

**PLEASE TAKE NOTICE** that on October 21, 2024, Defendants Torrent Pharmaceuticals Ltd. and Torrent Pharma Inc. (“Torrent”), by and through its undersigned counsel, shall move for the entry of an Order clarifying that Dr. Nagaich may testify as to all topics disclosed in his expert report and, to the extent necessary, amending or correcting the Court’s ruling on the parties’ liability experts to allow Dr. Nagaich to so testify.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Torrent shall rely on the accompanying Memorandum of Law in Support of Torrent’s Motion to Clarify Whether Dr. Nagaich May Testify as to Certain Topics with Respect to which Plaintiffs’ Expert, Mr. Russ, Has Been Permitted to Testify.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: September 27, 2024

Respectfully Submitted:

By: /s/ Alexia R. Brancato

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**CERTIFICATE OF SERVICE**

I, Alexia R. Brancato, an attorney, hereby certify that on September 27, 2024, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF and caused the unredacted version filed under seal to be served on all counsel of record by email.

/s/ Alexia R. Brancato

Alexia R. Brancato  
Kirkland & Ellis LLP